



1460 4TH STREET, SUITE: 210 • SANTA MONICA, CA 90401 • OFFICE: 310.451.9990 FAX: 310.451.9992

*KRISTOPHER E. STORTI*

January 29, 2009

Via FedEx

Leo Valencia  
dba A.V.E.L.A. (aka Art and Vintage Entertainment Licensing Agency)  
1135 Terminal Way, #209  
Reno, Nevada 89502

**Re: Infringement of Bruce Lee's Name and Likeness**

Dear Mr. Valencia:

We are writing to request that you immediately cease and desist from using Bruce Lee's name, likeness, or any other intellectual property owned by the Heirs of Bruce Lee and Bruce Lee Enterprises, LLC (collectively, "BLE") in connection with any merchandise or services.

BLE owns all rights associated with Bruce Lee, including the trademark rights in his name and likeness, the rights of publicity in his name, image, and likeness, the copyrights in his artwork and quotes, and all other trademarks created and used by Bruce Lee. As you know, Bruce Lee is the most famous martial artist in history, and an equally famous actor, writer, and teacher. As a result, BLE's trademark rights are extremely strong throughout the world.

We have learned that, without BLE's knowledge or consent, you have been marketing, advertising and selling clothing, including without limitation t-shirts, using Bruce Lee's name and likeness ("Bruce Lee Products") online through [www.urbanoutfitters.com](http://www.urbanoutfitters.com), in Target stores, and through other online channels of distribution. We are enclosing copies of the infringing t-shirts offered for sale. These activities are not authorized by BLE in any respect.

The marketing, advertising and selling of the Bruce Lee Products constitute trademark infringement, false designation of origin and dilution under the Lanham Act, 15 U.S.C. §§ 1114, 1125(a) and (c), as well as unauthorized celebrity endorsement in violation of California Civil Code § 3344.1. Your actions also constitute unfair competition under California State law and the Lanham Act.

Notwithstanding its rights and available remedies, BLE would like to resolve this matter amicably. Accordingly, BLE requests that you agree in writing to immediately: (a) stop using Bruce Lee's name, likeness or any design or logo confusingly or substantially similar thereto and any copyrighted work featuring Bruce Lee; (b) agree not to use Bruce Lee's name, likeness or any design or logo confusingly or substantially similar thereto and any copyrighted work featuring Bruce Lee in the future; (c) turn over all remaining Bruce Lee Products to BLE; (d) provide the identity of the person or business (if any) from which you obtained the Bruce Lee images and/or heat transfers used by you; and (e) provide us with an accounting of your sales of the Bruce Lee Products. The accounting must include: (i) the total units made of the Bruce Lee Products; (ii) the total units sold, and (iii) your cost to manufacture or obtain the Bruce Lee Products.



**BRUCE LEE**  
ENTERPRISES

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Further, we would appreciate you facilitating the immediate removal of these infringing products from your various distributor's and/or customer's stores. In the alternative, should you wish BLE to contact your various distributor's and/or customer's stores directly where this matter is concerned, we would be happy to do so. However, as Urban Outfitters and Target are current distributors and/or customers of yours, and we are sensitive to your ongoing relationship with them and we are providing you with the option of handling this matter directly.

You may indicate your consent to these requests by signing the original of this letter and returning it to me. A copy of this letter is enclosed for your records. We require your written assurances by February 20, 2009. Otherwise, BLE will be forced to consider all legal remedies available to it for your conduct. However, we are hopeful that an amicable resolution can be reached. We look forward to your prompt response to this letter, and we appreciate your anticipated cooperation with respect to this matter.

Nothing contained in this letter, nor any act or omission to act by BLE, is intended or should be deemed to be a waiver, abridgment, alteration, modification or reduction of any rights, claims, defenses or remedies that BLE may have in regard to this matter and all such rights, claims, defenses and remedies, whether at law or in equity, are hereby expressly reserved.

Very truly yours,

Kristopher E. Storti  
General Counsel,  
Bruce Lee Enterprises, LLC

Enclosures

cc: Shannon Lee  
Christine Sovich, Esq.

**AGREED AND ACCEPTED:**

Leo Valencia, dba A.V.E.L.A.

Date: \_\_\_\_\_

\_\_\_\_\_  
Leo Valencia